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February 26, 2014

Re: *Peterson v. Islamic Republic of Iran*, Case No. 13 Civ. 9195 (KBF) [Rel. Case 10 Civ. 4518 (KBF)]

Via ECF and Electronic Mail

The Honorable Katherine B. Forrest
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Dear Judge Forrest:

We represent Clearstream Banking, S.A. ("Clearstream"), a defendant in the above-referenced action. We write in compliance with the Court's February 24, 2014 Order directing that any party objecting to unsealing the Complaint commencing this case shall notify the Court no later than February 26, 2014.

Clearstream does object to unsealing the Complaint, which contains information provided pursuant to and in reliance upon one or more protective orders. In addition, as Clearstream has advised the Court, Clearstream believes that the language of the Complaint could be misconstrued in certain respects, in a manner unintended by plaintiffs that could be harmful to Clearstream. We and counsel for Banca UBAE are discussing the matter with counsel for plaintiffs.

Clearstream therefore respectfully requests that the Complaint remain under seal until motions to dismiss have been resolved, or the Complaint amended. If the Court declines to maintain the sealed status of the Complaint, we respectfully request that the complaint be redacted before it is unsealed, and that the parties be given time to agree upon the redactions, a process which is underway.

Respectfully,


Karen E. Wagner

Liviu Vogel, Esq.

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February 26, 2014

cc: All Counsel of Record (via ECF and Electronic Mail)